

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
  )  
  )  
v.    )         CRIM. NO. 04-10031-WGY  
  )  
  )  
JAMES REID                                    )

MOTION FOR A PRETRIAL CONFERENCE

Counsel for the defendant James Reid respectfully requests that this Court convene the parties for a pretrial conference in advance of the trial date in this matter. This case is set to begin trial on Monday November 13, 2006. As grounds for this motion, defense counsel states that there are issues related to the scope of the government's case, the late-breaking discovery of documentary evidence in digital form, and jury selection that ought to be addressed by the Court before trial commences. In addition, the defense requests a date before trial to use as a subpoena return date. This is necessitated because computer data previously thought not to exist has come to light and must now be investigated by the defense. To counsel's knowledge, there is no pretrial conference between today's date and the trial date scheduled. Defense counsel therefore requests a subpoena return date of November 8, 2006 and that this court hold a pretrial conference on that date or some other date during the week of November 6, 2006.

Wherefore, for the above-stated reasons, defense counsel requests that this Court convene a pretrial hearing in this matter, preferably on Wednesday November 8 if that date is convenient with the Court.

Respectfully submitted,

By his attorney,

/s/ Syrie D. Fried  
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CERTIFICATE OF SERVICE

I, Syrie D. Fried, do hereby certify that this document has been filed electronically and that it will be served electronically to registered ECF participants as identified on the Notice of Electronic Filing (NEF) on November 3, 2006.

/s/ Syrie D. Fried